



TOWN COUNCIL – AGENDA REQUEST FORM

THIS FORM WILL BECOME PART OF THE BACKGROUND INFORMATION USED BY THE COUNCIL AND PUBLIC

Please submit Agenda Request Form, **including back up information, 8 days prior** to the requested meeting date. **Public Hearing requests must be submitted 20 days prior to the requested meeting date to meet publication deadlines** (exceptions may be authorized by the Town Manager, Chairman/Vice Chair).

MEETING INFORMATION

Date Submitted: 9/29/16 Date of Meeting: 10/13/16
Submitted by: Tom Mahon Time Required: 30 minutes
Department: Town Council Background Info. Supplied: Yes X No ☐
Speakers: Tom Mahon

CATEGORY OF BUSINESS (PLEASE PLACE AN "X" IN THE APPROPRIATE BOX)

Appointment:	<input type="checkbox"/>	Recognition/Resignation/Retirement:	<input type="checkbox"/>
Public Hearing:	<input type="checkbox"/>	Old Business:	<input type="checkbox"/>
New Business:	X	Consent Agenda:	<input type="checkbox"/>
Nonpublic:	<input type="checkbox"/>	Other:	<input type="checkbox"/>

TITLE OF ITEM

Consideration of Right-To-Know request to NH DES Air Quality Division

DESCRIPTION OF ITEM

To date there is very little information from the Air Quality Division regarding their monitoring of emissions from the Saint-Gobain site. I am asking for a discussion of the issue and if the council desires to generate a formal R-T-K request to fill what I consider to be a glaring gap in information on the PFOA issue

REFERENCE (IF KNOWN)

RSA:	RSA 91-A:4	Warrant Article:
Charter Article:	4-7, C1	Town Meeting:
Other:		N/A:

EQUIPMENT REQUIRED (PLEASE PLACE AN "X" IN THE APPROPRIATE BOX)

Projector:	X	Grant Requirements:	<input type="checkbox"/>
Easel:	<input type="checkbox"/>	Joint Meeting:	<input type="checkbox"/>
Special Seating:	<input type="checkbox"/>	Other:	<input type="checkbox"/>
Laptop:	<input type="checkbox"/>	None:	<input type="checkbox"/>

CONTACT INFORMATION

Name:	Tom Mahon	Address:	31 Naticook Road
Phone Number:	494-2579	Email Address:	tmahon@merrimacknh.gov

APPROVAL

Town Manager: Yes <input type="checkbox"/> No <input type="checkbox"/>	Chair/Vice Chair: Yes <input type="checkbox"/> No <input type="checkbox"/>
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TO: Merrimack Town Council
Eileen Cabanel

FROM: Tom Mahon

DATE: September 29, 2016

SUBJECT: Agenda Request, R-T-K Request, NHDES Air Quality Division

I am formally asking the Council to consider instructing the Town Manager to have Town Counsel prepare and forward a formal Right-To-Know request under RSA 91-A:4, ACCESS TO GOVERNMENTAL RECORDS AND MEETINGS to the New Hampshire Department of Environmental Services (NHDES) for their records of their permitting, inspections, agreements, reports and other relevant materials pertaining to the air discharges, air testing, etc. of Saint-Gobain Performance Plastics and predecessor operations (CHEMFAB, General Electric, et al) at their location in Merrimack.

It is apparent to me that the swath of contamination exhibited by NHDES mapping (<http://des.nh.gov/organization/commissioner/documents/pfoa-saintgobain-poster-20160902.pdf>) is predominantly attributable to the prevailing wind patterns of the region. The Air Quality Division is responsible for discharges that potentially can affect air quality in New Hampshire (See [Air Compliance Reporting for Stationary Sources](#) and [Air Quality Monitoring and Data Section](#), attached). Much has been made of the voluntary transmittal of stack emissions by Saint-Gobain to NHDES. Yet, only brief mention, in the broadest terms, has been made at public and private meetings regarding the Air Quality Division's interactions with Saint-Gobain. I have seen only one or two press reports about testing, and that testing took place after the revelations regarding PFOA/PFOC contamination in Merrimack and surrounding towns. The perception that PFOA's are only in or on the ground diminishes the transmittal medium. Perhaps this is because it seems that the spread of the contamination through the air is a given, and the huge focus on ground water contamination is because of the immediacy of the potential health issues associated with the chemicals.

I believe that the request is necessary to fill the information gap cited above.

I look forward to a discussion and your counsel on this matter.



Most recent result shown for wells sampled on more than one occasion



Area of Investigation

PFOA + PFOS (PPT)

- ≥400
- 70 - <400
- 10 - <70
- <10
- Results Pending

Public Water Supplies

- Water Distribution

Transportation

- US/NH Route
- Road
- Driveway
- Political Boundary

1:8,400
1 in = 700 feet





[Divisions](#) > [Air Resources Division](#) > [Programs/Bureaus/Units](#) > [Air Compliance Reporting for Stationary Sources](#) >

Types of Reports

Report Type	Submittal Frequency and/or Deadline for Receipt by DES
Emission and Usage Statements/Reports	
Annual Emissions Statements/Reports	Annually, by April 15
Annual NOx Statement/Report	Required reports are listed in the reporting section of the permit and depend on the complexity of the source. Some are due quarterly, some semi-annually, and some annually.
Annual VOC Statement/Report	
Fuel Usage Report	
Material Usage Report	
Ammonia Usage Report	

[Title V Reports](#)

Title V Annual Compliance Certification 	Annually, by April 15 of the following calendar year
Title V Semi-Annual Permit Deviation and Monitoring Report 	By July 31 and January 31 following the semi-annual period

[CEM Reports \(Continuous Emissions Monitoring\)](#)

Quarterly CEM (Excess) Emission Report	
Quarterly CEM Cylinder Gas Audit	30 days after end of calendar quarter.
Quarterly Part 75 Linearity Audit	
Quarterly CEM Opacity Audit	
Flow Monitor Transducer Check	
Quarterly CEM Relative Accuracy Audit	
CEM QA/QC Plan Review	Annually
Annual Opacity 7-Day Drift Test	Annually
Annual Part 60 CEM RATA	
Annual/Semi-annual Part 75 CEM RATA	45 days after completion of the RATA

[Stack Test Reports \(One Time or Periodic Testing\)](#)

Pre-test protocol for Compliance Stack Test	30 days prior to test
Compliance Stack Test Report	60 days after completion of the test

[Permit Deviation Reports](#)

Permit Deviation with Excess Emissions – non-Title V permitted sources	Initial notification w/in 24 hours of discovery.
Permit Deviation with Excess Emissions – Title V sources	Initial notification w/in 24 hours of discovery and a detailed written report w/in 10 days of discovery.
Permit Deviation with no Excess Emissions – Title V sources	If the PD has continued for more than 9 consecutive days, notification to DES on the 10th day.


Federally Required Reports

Sources subject to federal requirements such as a New Source Performance Standard (NSPS) in 40 CFR 60 or to a Maximum Achievable Control Technology (MACT) standard specified in 40 CFR 63 frequently have to comply with reporting requirements specified by that federal rule. This can be the requirement to submit an initial, one-time only report, or to submit periodic reports on a quarterly, semi-annual or annual basis. The specific reporting requirements of the particular [NSPS](#) or [MACT](#) standard to which the source is subject are referenced and described in its permit.

Other Reports

This list includes the most commonly required reports. However, there are many other reports not included in this list that a source may be required to submit to DES. The source must review the reporting requirements listed in its permit to determine the specific reports it is required to submit and the respective deadlines for receipt by DES.

 Microsoft Word format. Download a free viewer from [Microsoft](#).

Select Language 

AIR QUALITY MONITORING STATIONS

September 2012

0 10 20
Miles



- 1 GREENS GRANT [AMC/DES/USFS], CAMP DODGE
- 2 SARGENTS PURCHASE [DES], MT WASHINGTON SUMMIT
- 3 WOODSTOCK [DES/HBRF/CASTNET], HUBBARD BROOK
- 4 LEBANON AIRPORT [DES]
- 5 LACONIA [DES], GREEN STREET
- 6 CONCORD [DES], HAZEN DRIVE
- 7 PEMBROKE [DES], PEMBROKE HIGHWAY GARAGE
- 8 PORTSMOUTH [DES], PIERCE ISLAND
- 9 RYE [DES], SEACOAST SCIENCE CENTER
- 10 KEENE [DES], WATER STREET
- 11 LONDONDERRY [DES], MOOSE HILL SCHOOL
- 12 PETERBOROUGH [DES], MILLER STATE PARK
- 13 NASHUA [DES], CROWN STREET
- 14 NASHUA [DES], GILSON ROAD

